

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

IAN LUCAS,	)	
	)	
Plaintiff,	)	Case No. 3:24-cv-00440
	)	
v.	)	Judge Waverly Crenshaw
	)	
MARY ANN JESSEE et al.,	)	Magistrate Judge Frensley
	)	
Defendants.	)	

**STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Ian Lucas and Defendants Mary Ann Jessee, Michelle Tellock, Joel Newsome, Melissa Porter, G.L. Black, Clairise Gamez, Neil Jamerson, Jeremy Bourgoin, Mavis Schorn, Pamela Jefferies, Marissa Shulruff, E. Jacob Cummings, Jill Harris, Heather Robbins, Cate Enstrom, Crystal Ritchie, Angela Weaver, Mary Roy, Michael Fazi, and Feylyn Lewis<sup>1</sup> (“Defendants”) file this Stipulation of Dismissal Without Prejudice as to Plaintiffs’ claims against all individual Defendants named in this matter and the Vanderbilt University School of Nursing. The intent of this Stipulation is for Plaintiff’s claims, as set forth in the proposed Third Amended Complaint (Doc. No. 60), to proceed against Defendant The Vanderbilt University<sup>2</sup> (“Vanderbilt”) as the sole Defendant, while claims against the individual Defendants and the Vanderbilt University School of Nursing are dismissed.

Vanderbilt has not entered an appearance. However, Defendants’ counsel has conferred with Vanderbilt’s counsel and understands that Vanderbilt – while reserving all

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<sup>1</sup> The 20 Defendants listed are all Defendants that have been served and appeared in this matter to date.

<sup>2</sup> The Vanderbilt University School of Nursing is a part of the greater Vanderbilt University and is not a separate legal entity. Thus, the proper party for claims against the Vanderbilt University School of Nursing is Vanderbilt University.

defenses, including the right to challenge the Third Amended Complaint through a motion to dismiss or other dispositive motion – will not oppose Plaintiff's pending Motion for Leave to File an Amended Complaint / Third Amended Complaint (Doc. No. 60) in light of Plaintiff's agreement to dismiss the individual Defendants and the Vanderbilt School of Nursing.

Accordingly, Plaintiff and Defendants hereby stipulate to the dismissal without prejudice of all individual Defendants named in this matter and the Vanderbilt School of Nursing.

Respectfully submitted,



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Ian Hunter Lucas  
*Plaintiff Pro Se*  
221 Charleston Avenue  
Pleasant View, Tennessee, 37146  
Phone: (910) 872-3577  
Email: LucasIanHunter@outlook.com



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Kevin C. Klein (#23301)  
KLEIN SOLOMON MILLS, PLLC  
1322 4th Avenue North  
Nashville, Tennessee 37208  
(615) 600-4780  
kevin.klein@kleinpllc.com

*Counsel for Defendants Mary Ann Jessee, Michelle Tellock, Joel Newsome, Melissa Porter, G.L. Black, Neil Jamerson, Jeremy Bourgoin, Mavis Schorn, Pamela Jefferies, E. Jacob Cummings, Jill Harris, Heather Robbins, Cate Enstrom, Angela Weaver, Mary Roy, Michael Fazi, and Feylyn Lewis*

s/ Mark A. Baugh

Mark A. Baugh, BPR No. 015779  
Denmark J. Grant, BPR No. 036808  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
1600 West End Avenue, Suite 2000  
Nashville, Tennessee 37203  
Telephone (615) 726-5600  
Facsimile (615) 744-5760

*Attorneys for Defendants Clairise Gamez, Crystal  
Ritchie, and Marissa Shulruff*

### **CERTIFICATE OF SERVICE**

I certify that I filed the foregoing STIPULATION OF DISMISSAL on the Court's CM/ECF system on this 4th day of June, 2024, which forwarded a copy to:

Ian Lucas  
221 Charleston Avenue  
Pleasant View, TN, 37126  
(910) 872-3577 (telephone)  
lucasianhunter@outlook.com

*Plaintiff Pro Se*

Mark A. Baugh, BPR No. 015779  
Denmark J. Grant, BPR No. 036808  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
1600 West End Avenue, Suite 2000  
Nashville, Tennessee 37203  
Telephone (615) 726-5600  
Facsimile (615) 744-5760

*Attorneys for Defendants Clairise Gamez,  
Crystal Ritchie, and Marissa Shulruff*



Kevin C. Klein